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VIA ECF

Judge Sarah Netburn
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: Murphy v. LaJaunie
No. 13 CV 6503

Dear Judge Netburn:

Together with the Law Offices of Jeffrey E. Goldman, we are class counsel in the above-referenced matter. I submit this status update in accordance with the Court's November 7, 2016 Order.

Defendant Lajaunie has now produced hundreds of pages of financial records that we have carefully reviewed. The parties are meeting on Monday, December 12, 2016, to discuss the amount and structure of a possible settlement in light of the Mr. Lajaunie's limited financial resources and the bankruptcy of 15 John Corp. Mr. Lajaunie has indicated that once Plaintiffs make their inquest submissions he will likely retain counsel in order to submit an opposition, which would reduce the money available to pay a settlement or collect on a judgment. Therefore, to allow the parties to engage in productive settlement discussions while preserving the resources available to pay a settlement, we respectfully request that the Court adjourn the deadline for Plaintiffs' damages inquest submission from December 19, 2016 to January 19, 2016. This is the third request for an adjournment of this deadline, and the Court granted our previous requests. Defendant Lajaunie consents to this request.

We thank the Court for its attention to this matter.

Respectfully submitted,



Denise A. Schulman